

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	CRIMINAL NO. 04-10117-RWZ
)	
v.)	VIOLATIONS:
)	
1. DARREN FRANKLIN,)	21 U.S.C. § 841(a)(1) --
a/k/a "D," and)	Possession with Intent to
)	Distribute and Distribution of
2. ROLAND WORRELL,)	Cocaine Base
)	
)	18 U.S.C. § 2 --
)	Aiding and Abetting
)	
)	21 U.S.C. § 860(a) - School
)	Zone Violation
Defendants.)	
)	18 U.S.C. § 922(g)(1) --
)	Felon in Possession of
)	Ammunition

SUPERSEDING INDICTMENT

COUNT ONE: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine
Base; 21 U.S.C. § 860(a) -- School Zone Violation)

The Grand Jury charges that:

On or about May 8, 2003, at Boston, in the District of
Massachusetts,

1. DARREN FRANKLIN, a/k/a "D",

defendant herein, did knowingly and intentionally possess with
intent to distribute, and did distribute, a quantity of cocaine
base, also known as "crack," a Schedule II controlled substance,
within 1,000 feet of the real property comprising the George A.
Lewis School, a public middle school.

The Grand Jury further charges that the offense involved 5
grams or more of a mixture or substance containing a detectable

amount of cocaine base, also known as "crack." Accordingly, 21 U.S.C. § 841(b)(1)(B)(iii) is applicable to this offense.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

COUNT TWO: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base; 21 U.S.C. § 860(a) -- School Zone Violation; 18 U.S.C. § 2 -- Aiding and Abetting)

The Grand Jury further charges that:

On or about July 10, 2003, at Boston, in the District of Massachusetts,

1. **DARREN FRANKLIN, a/k/a "D" and**
2. **ROLAND WORRELL,**

defendants herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance, within 1,000 feet of the real property comprising the George A. Lewis School, a public middle school.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a), and Title 18, United States Code, Section 2.

COUNT THREE: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base)

The Grand Jury further charges that:

On or about March 12, 2004, at Randolph, in the District of Massachusetts,

1. DARREN FRANKLIN, a/k/a "D",

defendant herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance.

The Grand Jury further charges that the offense involved 5 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack." Accordingly, 21 U.S.C. §§ 841(b)(1)(B)(iii) is applicable to this offense.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR: (21 U.S.C. § 841(a)(1) -- Possession of Cocaine Base with Intent to Distribute)

The Grand Jury further charges that:

On or about April 15, 2004, at Brockton, in the District of Massachusetts,

1. DARREN FRANKLIN, a/k/a "D",

defendant herein, did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, also known as "crack," a Schedule II controlled substance.

The Grand Jury further charges that the offense involved 50 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack." Accordingly, 21 U.S.C. §§ 841(b)(1)(A)(iii) is applicable to this offense.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE: (18 U.S.C. § 922(g)(1) -- Felon in Possession of Ammunition)

The Grand Jury further charges that:

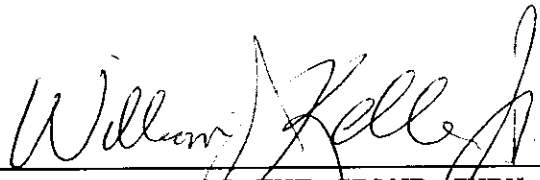
On or about April 15, 2004, at Brockton, in the District of Massachusetts,

1. DARREN FRANKLIN, a/k/a "D",

defendant herein, having previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce ammunition, to wit: 125 rounds of Winchester .40 caliber ammunition; 50 rounds of Winchester .380 caliber ammunition; 50 rounds of Winchester .357 caliber ammunition; 50 rounds of Winchester .45 caliber ammunition; 29 rounds of Federal Cartridge Company 9 millimeter ammunition; 20 rounds of Federal Cartridge Company .22 caliber ammunition; 38 rounds of Winchester .38 caliber ammunition; 29 rounds of Eldorado Cartridge Corporation .40 caliber ammunition; 41 rounds of Magtech .40 caliber ammunition; and 6 rounds of Federal Cartridge Company .40 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).


A TRUE BILL


FOREPERSON OF THE GRAND JURY


ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS: May 27, 2004 @ 4:23 PM

Returned into the District Court by the Grand Jurors and
filed.


DEPUTY CLERK